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EPA Region 5 Records Ctr.



312170

From: UNSELDT@DEQ-SW-LP.DEQ-PLAINWELL
Sent: Tuesday, May 23, 2000 11:43 AM
To: vonguntj@DEQ-SC.DEQ-ERD
Cc: LEEPT@DEQ-SW-LP.DEQ-Plainwell
Subject: Re: Allied OU Faxed Proposal for Response Action

I reviewed the letter that you faxed to me on 5/18/2000 concerning relocation of 50,000 cubic yards of PCB contaminated paper sludge from the King Mill to the Bryant HRDL area of the Allied OU. The letter maintains that the materials will be capped with a Part 115 compliant landfill cap consisting of a gas venting layer, an infiltration barrier (30 mil PVC), 24 inches of protective soil and a vegetative soil layer at least 6 inches thick.

The letter also proposes that the area will be isolated utilizing a sheetpile system in conjunction with the perimeter berm. As I have previously commented, the sheetpile without any separation of the waste materials does not constitute an acceptable means of isolating the paper sludge from the surrounding environment.

As we discussed on the telephone, The incorporation of additional materials under the cap could be a benefit since the increased slopes on the cap will help to further limit infiltration into the underlying contaminated sludges. The increase in slopes does have a practical limit however. The resulting slopes will need to be stable and designed to limit surficial erosion. Given the nature of the paper sludges, an great increase in slopes will not be beneficial. Other papermill landfills in the area have slopes that are limited to between 10% and 16.7% to ensure that they are stable over the long term. To limit erosion diversion berms and other long term erosion control devices may need to be designed into the final cover to limit erosion in the short and long term.

Part 115 exempts from regulation materials generated from the remediation of environmental contamination if they are disposed of at the site or at other property owned by the responsible party if it is done under a Remedial Action Plan approved under Part 201. I do not know the TSCA requirements for this material and do not regulate those concerns.

One other ancillary issue that may be important in design of a closure at the site would be the influence of the sheetpile/cap containment system on the waste materials. It is likely that sheetpile would cause the groundwater level to rise into the landfill. This could cause stability problems and cause the generation of contaminated leachate that would need to be appropriately treated over the long term. I would suggest that a hydrogeologist look at this issue to determine how much influence the sheetpile/cap containment system will have and then make sure that the responsible parties design an effective collection/removal/treatment system for this liquid if it is deemed relevant.

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>>> J. Brian von Gunten 05/22 8:37 AM >>>
Tim-
Any way you can get something in a e-mail on this by Wednesday?

>>> Timothy Unsel 05/16 4:34 PM >>>
I received your fax today and I am wondering what you would like me to do. I was out at the GP Mill last week for a meeting and observed that sheet pile was being placed along both the Willow Blvd. site and the A-site. If the waste is not removed from the back side of the sheet pile and replaced with a clean soil backfill, then the containment does not meet the requirements of Part 115. It appears that this type of containment is being approved at these sites in spite of previous comments from WMD that it would not comply with Part 115.

To my knowledge, BBL has also proposed the same type system for the Allied/OU closures. If ERD chooses to approve this design, that is fine. Just be advised that it does not comply with Part 115.

It would appear that if the site is not to be closed in accordance with Part 115 then my review of the documents prepared for closure would be of limited utility.

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